

1 THOMAS D. DILLARD, JR., ESQ.
2 Nevada Bar No. 006270
3 **OLSON CANNON & GORMLEY**
4 9950 W. Cheyenne Avenue
5 Las Vegas, NV 89129
6 Telephone: (702) 384-4012
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tdillard@ocgas.com
Attorney for Defendants
Shari Dixon, R.N. and
Pat Brown, R.N.

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10
11 DAVID MONROE, an individual;

12 Plaintiff,

13 vs.

14 SHARI DIXON, RN, individually;
15 PAT BROWN, RN, individually; JOHN R.
16 HOLMAN, MD, individually; SERGEANT
17 SCHEMANAUER, individually; DEPUTY
18 CHARLES, individually; DEPUTY
19 BARDEN, individually; DEPUTY
20 LAVEZZO, individually; DEPUTY RIKER,
21 individually; DEPUTY JAQUEZ,
22 individually; DEPUTY DRAGAS,
23 individually; DEPUTY MCLAUGHLIN,
individually; DEPUTY MARTINEZ,
individually; and DOES I through IX,
inclusive; and ROE CORPORATIONS
I through V, inclusive,

CASE NO. 2:23-cv-00677-JAD-EJY

24 Defendants.

25
26 **STIPULATION AND ORDER TO DISMISS WITH PREJUDICE**

27
28
Law Offices of
OLSON CANNON & GORMLEY
A Professional Corporation
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
Fax (702) 383-0701
(702) 384-4012

Plaintiff DAVID MONROE, an individual, ("Plaintiff") and Defendants SHARI DIXON, RN, individually, PAT BROWN, RN, individually, JOHN R. HOLMAN, MD, individually, SERGEANT SCHEMANAUER, individually, DEPUTY CHARLES, individually, DEPUTY BARDEN, individually, DEPUTY LAVEZZO, individually, DEPUTY RIKER, individually, DEPUTY JAQUEZ, individually, DEPUTY DRAGAS, individually, DEPUTY MCLAUGHLIN, individually, DEPUTY MARTINEZ, individually, and CLINTON THORNE, individually ("Defendants"), each acting by and through their undersigned counsel, hereby Stipulate and Agree pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii) that all claims and causes of action asserted by Plaintiff against Defendants, as set forth in the Plaintiff's Complaint shall be dismissed with prejudice, with each party to bear their own attorneys' fees and costs.

DATED this 22nd day of August, 2024.

DATED this 22nd day of August, 2024.

ATKINSON WATKINS &
HOFFMANN, LLP

OLSON CANNON & GORMLEY

BY: /s/ Tyler M. Crawford BY:
 MATTHEW W. HOFFMANN, ESQ.
 TYLER M. CRAWFORD, ESQ.
 10789 W. Twain Ave., Suite 100
 Las Vegas, Nevada 89135
Attorneys for Plaintiff


 THOMAS D. DILLARD, JR., ESQ.
 9950 W. Cheyenne Avenue
 Las Vegas, Nevada 89129
 Attorney for Defendants
 Shari Dixon, R.N. and Pat
 Brown, R.N.

///

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DATED this 22nd day of August, 2024.

WEINBERG, WHEELER, HUGGINS,
GUNN & DIAL, LLC

By: /s/ Carol P. Michel BY: /s/ Katherine F. Parks
CAROL P. MICHEL, ESQ.
TRISHA R. DELOS SANTOS, ESQ.
6385 S. Rainbow Blvd., Suite 400
Las Vegas, Nevada 89118
Attorney for Defendant
John R. Holman, MD

DATED this 22nd day of August, 2024.

THORNDAL ARMSTRONG PC

KATHERINE F. PARKS, ESQ.
6590 S. McCarran Blvd., Suite B
Reno, Nevada 89509
Attorney for Defendants
Jeff Schemanauer, Mark
Charles, Michael Barden,
Dominic Lavezzi, Payton
Riker, Suselly Jaquez, Tomasz
Dragas, Brady McLaughlin,
Thomas Martinez, and Clinton
Thorne

ORDER

IT IS SO ORDERED this ____ day of _____, 2024.

UNITED STATES DISTRICT JUDGE

Submitted by:

OLSON CANNON & GORMLEY

BY: 
THOMAS D. DILLARD, JR., ESQ.
Nevada Bar No. 006270
9950 W. Cheyenne Avenue
Las Vegas, Nevada 89129
Attorney for Defendants
Shari Dixon, R.N. and Pat
Brown, R.N.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24 day of August, 2024, I served the above

STIPULATION AND ORDER TO DISMISS WITH PREJUDICE through the CM/ECF system of the United States District Court for the District of Nevada (or, if necessary, by U.S. Mail, first class, postage pre-paid), upon the following:

Matthew Hoffman, Esq.
Tyler M. Crawford, Esq.
ATKINSON WATKINS & HOFFMAN, LLP
10789 W. Twain Ave #100
Las Vegas, NV 89135
Attorney for Plaintiff

Katherine F. Parks, Esq.
THORNDAL ARMSTRONG, PC
6590 S. McCarran Blvd., Suite B
Reno, Nevada 89509
Attorney for Deputy Defendants
JEFF SCHEMANAUER, MARK CHARLES, MICHAEL BARDEM,
DOMINIC LAVEZZO, PAYTON RIKER, SUSELLY JAQUEZ,
TOMASZ DRAGAS, BRADY MCLAUGHLIN, THOMAS MARTINEZ,
and CLINTON THORNE

Carol P. Michel, Esq.
WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC
6385 S. Rainbow Boulevard, Suite 400
Las Vegas, Nevada 89118
Attorney for Defendant
JOHN R. HOLMAN, MD

An employee of OLSON CANNON & GORMLEY

Nan Langenderfer

From: Tyler Crawford <tgcrawford@awhlawyers.com>
Sent: Thursday, August 22, 2024 1:13 PM
To: Nan Langenderfer
Cc: Tom Dillard; Aideet Rogers
Subject: RE: Monroe v. Dixon, et al

Hi Nan:

You may use my e-signature on the stip.

Thanks ,

Tyler Crawford, Esq.:



DBA of Atkinson Watkins
& Hoffmann LLP

702-562-6000

10789 W. Twain Ave, Ste 100
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From: Nan Langenderfer <nlangenderfer@ocgattorneys.com>
Sent: Thursday, August 22, 2024 11:44 AM
To: Tyler Crawford <tgcrawford@awhlawyers.com>
Cc: Tom Dillard <tdillard@ocgattorneys.com>
Subject: RE: Monroe v. Dixon, et al

Good morning. I am following up on my prior email concerning the proposed Stipulation and Order for Dismissal with Prejudice. If acceptable, please advise if we can affix your /e/ signature.

Thank you.

Nan Langenderfer
Legal Assistant to Walter R. Cannon, Esq.,
Thomas D. Dillard, Jr.,
and Stephanie A. Barker, Esq.
Olson Cannon & Gormley
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Nan Langenderfer

From: Michel, Carol <CMichel@wwhgd.com>
Sent: Monday, August 12, 2024 5:06 PM
To: Nan Langenderfer; 'tcrawford@awhlawyers.com'; 'kfp@thorndal.com'
Cc: Tom Dillard
Subject: RE: Monroe v. Dixon, et al

Looks fine to me and you can affix my signature.



Carol P. Michel, Attorney
Weinberg Wheeler Hudgins Gunn & Dial
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From: Nan Langenderfer <nlangenderfer@ocgattorneys.com>
Sent: Monday, August 12, 2024 7:34 PM
To: 'tcrawford@awhlawyers.com' <tcrawford@awhlawyers.com>; 'kfp@thorndal.com' <kfp@thorndal.com>; Michel, Carol <CMichel@wwhgd.com>
Cc: Tom Dillard <tdillard@ocgattorneys.com>
Subject: RE: Monroe v. Dixon, et al

This Message originated outside your organization.

Counsel:

Attached please find proposed Stipulation and Order to Dismiss with Prejudice in the above matter. Please advise if we have your permission to affix your /e/ signature.

Thank you!

Nan Langenderfer
Legal Assistant to Walter R. Cannon, Esq.,
Thomas D. Dillard, Jr.,
and Stephanie A. Barker, Esq.

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From: Katherine F. Parks <KFP@thorndal.com>
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To: Nan Langenderfer; 'tcrawford@awhlawyers.com'; 'cmichel@wwhgd.com'
Cc: Tom Dillard
Subject: RE: Monroe v. Dixon, et al

Please feel free to file with my electronic signature.

Thank you,

Katherine F. Parks | President | Thorndal Armstrong, PC |
6590 S. McCarran Blvd., Suite B | Reno, NV 89509
(775) 786-2882 (phone) | (775) 786-8004 (fax)

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From: Nan Langenderfer <nlangenderfer@ocgattorneys.com>
Sent: Monday, August 12, 2024 4:34 PM
To: 'tcrawford@awhlawyers.com' <tcrawford@awhlawyers.com>; Katherine F. Parks <KFP@thorndal.com>; 'cmichel@wwhgd.com' <cmichel@wwhgd.com>
Cc: Tom Dillard <tdillard@ocgattorneys.com>
Subject: RE: Monroe v. Dixon, et al

Counsel:

Attached please find proposed Stipulation and Order to Dismiss with Prejudice in the above matter. Please advise if we have your permission to affix your /e/ signature.

Thank you!

Nan Langenderfer
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